

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

SIX-DAY TO FIVE-DAY STREET DELIVERY
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-45 THROUGH 55]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. To the extent that a reference is made in the response to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

May 24, 2010

Respectfully submitted,

N20101H45

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-45 Please refer to your response to Interrogatory DFC/USPS-16 in this Docket dated April 26, 2010 and the response to Interrogatory DBP/USPS-46 in Docket N2009-1 dated October 13, 2009.

[a] Please confirm, or explain if you are unable to confirm, that these two responses were made to the same question or scenario and therefore represent a change in policy over the six plus months between the two responses.

[b] Please confirm, or explain if you are unable to confirm, that there are now two additional conditions which may prevent mail which a carrier collects from customers along their delivery route from being dispatched to the processing facility for processing

on the day of collection, namely, excessive distance from the plant and transportation schedules.

[c] Please confirm, or explain if you are unable to confirm, that the distance that a post office is from the plant is a foreseen circumstance.

[d] Please confirm, or explain if you are unable to confirm, that transportation schedules are a foreseen circumstance.

[e] Please advise the minimum distance that would have to exist between the post office and the processing plant before it could be considered to be excessive.

[f] What level of management will make the decision that a post office is an excessive distance from its processing plant?

[g] What other criteria are considered in making the decision that a post office is an excessive distance from its processing plant?

[h] Please confirm, or explain if you are unable to confirm, that whenever possible transportation schedules should be made to allow for meeting processing criteria.

[i] Please confirm, or explain if you are unable to confirm, that post offices should make the best use of their existing transportation.

[j] Other than a transportation schedule being set up which must leave early because of an excessive distance from the processing plant, please advise the scenarios under which transportation schedules will keep mail from being processed on the day of collection.

[k] Please advise the reasons why this change in policy was made.

[l] Please confirm, or explain if you are unable to confirm, that there are some post offices whose final dispatch is such that there are some days where collected mail will not be dispatched on the day of collection due to a late return of the carrier as a result of a circumstance such as a delayed start, mail volume, pivoted routes due to absences, etc.

[m] Please confirm, or explain if you are unable to confirm, that customers who give their carriers mail for dispatch have an expectation that it will be dispatched the same day.

[n] Please advise the method by which delivery customers are made aware that mail which they give to their carrier for dispatch will not be processed on the same day.

[o] Approximately what percentage of the post offices in the country that have delivery service utilize the excessive distance to the plant and/or transportation schedules "exception" to not provide consistent same day dispatch of carrier collected mail?

DBP/USPS-46 Please refer to your response to Interrogatory DBP/USPS-24 subparts [c] and [d].

[a] Please confirm, or explain if you are unable to confirm, that rural delivery carriers act as a "miniature post office on wheels" and provide many services to their customers such as sale of stamps, purchase of money orders, processing [including the determination of the proper postage] of all classes of single-piece mail, acceptance of money for these services, return of the service and/or change the following day.

[b] Please confirm, or explain if you are unable to confirm, that city delivery carriers only deliver all classes of mail and pick-up only fully prepaid single-piece mail.

[c] Please advise whether Contract Delivery Service carriers provide any of these services that are provided by a rural delivery carrier or are they limited to the same services of a city delivery carrier.

DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-24 subparts [c], [d], and [e]. Please also refer to your response to Interrogatory DFC/USPS-16 in this Docket dated April 26, 2010 and the response to Interrogatory DBP/USPS-46 in Docket N2009-1 dated October 13, 2009.

[a] Please confirm, or explain if you are unable to confirm, that if a post office is to provide same day dispatch to the processing plant of mail collected by the various delivery carriers, there must be a trip to the processing plant that departs after the return of the delivery carriers.

[b] Please confirm, or explain if you are unable to confirm, that if there is such a trip to the processing plant as referred to in subpart [a], mail which is deposited in the lobby drop and/or the blue collection box outside the post office can be included with the mail that the delivery carriers return with from their routes for dispatch to the plant that day.

[c] Please advise why the mail which is deposited in the lobby drop and/or the blue collection box outside the post office cannot be collected by the clearance clerk on duty at the facility or by another employee on duty at the same time.

[d] Please advise why the mail which is deposited in the lobby drop and/or the blue collection box outside the post office cannot be collected by a returning delivery carrier.

[e] Please confirm, or explain if you are unable to confirm, that if this later collection is made by the clearance clerk and/or other employee on duty and/or returning delivery carrier that the time associated with this later collection should be shown on the collection label.

DBP/USPS-48 Please refer to your response to Interrogatory DBP/USPS-26 subpart [b]

[a] Please clarify the last three words of your response. Does the "based on transportation" apply to the 5 PM collection as well as any that are later or does it only apply to those that are later?

[b] Please advise those conditions under which the final weekday collection can be earlier than 5 PM.

DBP/USPS-49 Please refer to your response to Interrogatory DBP/USPS-30 subpart [d]

Please advise the best estimate of the CPU locations that have retail hours on Friday that are after the final dispatch.

DBP/USPS-50 Please refer to your response to Interrogatory DBP/USPS-32 subpart [c]

Please explain why you consider a mid-morning dispatch to be characterized as an evening dispatch.

DBP/USPS-51 Please refer to your response to Interrogatory DBP/USPS-34 subpart [b].

Please confirm, or explain if you are unable to confirm, that the Postal Service can eliminate post office box delivery on Saturday at any facility that it unilaterally believes that customers do not have a need for the service.

DBP/USPS-52 Please refer to your response to Interrogatory DBP/USPS-41.

[a] Will the mail that has accumulated in the intake container of all APCs be evaluated each Saturday so that all Express Mail can be removed and dispatched on Saturday?

[b] If not, why not?

[c] If so, how will the mailing public be aware of the time of the last collection?

[d] Can all Express Mail, regardless of the method by which it is prepared and postage paid, be deposited in the APC?

[e] If not, why not?

DBP/USPS-53 Please refer to your response to Interrogatory DBP/USPS-39 subparts [e] and [f].

The original interrogatory was not intended to refer to overflow or additional collections but to those instances where the final collection time was made early and not made as posted. For example, a box with a posted final collection time of 5 PM is only collected at 12 Noon as has occurred in the past on days near a holiday.

[a] For any blue collection boxes which will have a final collection made prior to the existed posted time, such as occurred in the past on days surrounding holidays, have a notice placed on the box itself in a manner similar to the FedEx boxes located at a post office?

[b] If not, why not?

[c] Please refer to the second sentence in response to subpart f of the original interrogatory. Please confirm, or explain if you are unable to confirm, that it is the intention of the Postal Service to make all posted collections including on days around holidays which in the past have had final collection times advanced.

DBP/USPS-54 Please refer to your response to Interrogatory DBP/USPS-39 subparts [g] through [j].

[a] Please confirm your response to subpart [g] as well as the original interrogatory DBP/USPS-9 subpart [c] as I have received information that post offices in the US Virgin Islands celebrate four local holidays in addition to the ten federal holidays.

[b] Since tourism is a major activity in the area, please advise how tourists will be aware of the long established local customs.

[c] Do the notices posted as indicated in response to subpart [h] contain an indication that the collection service will be affected?

[d] If not, why not?

DBP/USPS-55 Please refer to your response to Interrogatory DBP/USPS-39 subparts [a] through [c].

[a] Please confirm, or explain if you are unable to confirm, that Independence Day 2009 [July 4, 2009] fell on a Saturday.

[b] Please confirm, or explain if you are unable to confirm, that normal delivery was made on Friday, July 3, 2009.

[c] In light of your responses to subparts [a] and [b] above, please respond, if necessary, to subparts [a] through [c] of interrogatory DBP/USPS-39.